

provided for inclusion in the clearinghouse be considered a representation by the manufacturer that equipment meets Section 255 requirements. Rather, the depository would be most useful and effective as an information resource, and would give manufacturers a vehicle for disseminating information on the types of equipment they offer of interest to individuals with disabilities.

In order to facilitate usage of this information mechanism by manufacturers and ease of oversight by the depository administrator, the Commission should impose no particular requirements regarding the format of information. Instead, manufacturers should present product information in whatever manner they believe is best suited to convey the information, whether in the form of a detailed description or a product list with contact or web site information.

2. Information on Manufacturer Performance

ITI opposes the FCC's proposals to publish information regarding a manufacturers' performance in providing accessible products or to establish a "seal" or mark that signifies a manufacturer's compliance with Section 255. Such a "seal" of approval could be equally misleading because a manufacturer may be in compliance with Section 255 even if it does *not* produce equipment with accessibility features (e.g. where including such features is not "readily achievable" for the manufacturer). A government "seal" identifying which equipment is accessibility-friendly would skew the marketplace in favor of the manufacturer who is better equipped to provide accessible products and against

the manufacturer for whom accessibility is not “readily achievable” due to reasons beyond the control of the manufacturer

3. Peer Review Processes

ITI opposes the *Notice*’s proposal to create a peer review process. As described in Section I, above, the IT industry already has successfully developed a variety of standards-setting processes that accommodate accessibility issues. The FCC should allow the industry to continue to develop voluntary processes that will determine what is reasonable and necessary in light of Section 255 requirements rather than legislate the development of a peer review process.

CONCLUSION

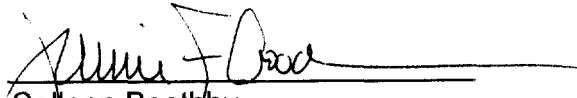
ITI supports the Commission’s efforts to implement the requirements of Section 255. Without modification, however, the proposed rules are likely to achieve the opposite result -- frustrating equipment manufacturers’ efforts to develop innovative solutions, discouraging beneficial specialization, and imposing unnecessary costs on manufacturers and consumers alike. To effectively implement Section 255, the rules must harness the existing marketplace forces that have promoted technological diversity in the equipment

marketplace. Only then will manufacturers be in the best position to meet the needs of those that Section 255 intends to serve

Respectfully submitted,

Information Technology Industry Council

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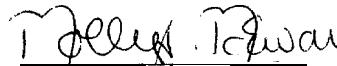
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June 30, 1998

Certificate of Service

I, Molly A. McEwan, hereby certify that a true and correct copy of the preceding Comments of the Information Technology Industry in WT Docket No. 96-198 were served this 30th day of June, 1998 via hand delivery upon the following party:

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June 30, 1998